

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

MARIE JOSEPH,)	Case No.: 1:16-CV-00465-TSB
)	
Plaintiff,)	Judge Timothy S. Black
)	
v.)	DEFENDANT’S RULE 26(A)(1)
)	INITIAL DISCLOSURES
RONALD JOSEPH)	
)	
Defendant.)	

In accordance with Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendant Ronald Joseph provides the following initial disclosures.

The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

As Defendant indicated in the Rule 26(f) report filed with the Court, and as further discussed during the June 10, 2016 Preliminary Pretrial Conference, Defendant asserts that there are threshold issues relating to the statute of limitations for Plaintiff’s asserted claims and Plaintiff’s standing to bring the asserted claims.

Because of these threshold issues, the individuals with discoverable information is substantially limited. Defendant reserves the right to amend his initial disclosures if this Court determines that the threshold issues are not as limiting as Defendant believes:

- Marie Joseph
- Ronald Joseph
- Hal Klink
c/o Michael G. Schwartz
Vorys, Sater, Seymour & Pease LLP
301 East Fourth Street
Great American Tower
Suite 3500
Cincinnati, OH 45202

(513) 723-4679

Mr. Klink is likely to have discoverable information about Najla Joseph, Plaintiff's relationship with Najla Joseph, matters relating to the Estate of Najla Joseph, the George Joseph Trust, and the guardianship of Michael Joseph.

- Paul Schwarz
c/o Michael G. Schwartz
Vorys, Sater, Seymour & Pease LLP
301 East Fourth Street
Great American Tower
Suite 3500
Cincinnati, OH 45202
(513) 723-4679

Mr. Schwarz is likely to have discoverable information about Najla Joseph, Plaintiff's relationship with Najla Joseph, matters relating to the Estate of Najla Joseph, the George Joseph Trust, and the guardianship of Michael Joseph.

A copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

- Records of payments Plaintiff received from the Defendant (hardcopies maintained in the Defendant's files).
- Correspondence between Plaintiff and the Defendant (hardcopies maintained in the Defendant's files).
- Correspondence between Joseph family members, their attorneys, agents, and employees (hardcopies maintained in the Defendant's files).
- Columbia's financial and shareholder records (hardcopies maintained in the Defendant's files and electronic files on his personal computer).
- Pleadings, testimony, and documents from the proceeding involving the guardianship of Michael Joseph (maintained by the Defendant's counsel).

A computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

Defendant does not claim any damages in this action.

For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Defendant will produce a copy of an insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Respectfully submitted,

/s/ James E. Burke

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*Trial Attorneys for
Defendant Ronald Joseph*

CERTIFICATE OF SERVICE

I certify that on June 16, 2016, I electronically filed these Initial Disclosures with the Clerk of the Court using the CM/ECF system, which will send notice to all counsel of record.

/s/ James E. Burke

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